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2 THE HONORABLE ROBERT S. LASNIK
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7 TRIAL DATE: 9/14/2020

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12 UNITED STATES DISTRICT COURT
13 WESTERN DISTRICT OF WASHINGTON
14 AT SEATTLE

15 TRESSA GRUMMER,

16 Plaintiff,

17 v.

18 WASHINGTON STATE
19 DEPARTMENT OF CORRECTIONS
20 and ROBERT CARSRUD,

21 Defendants.

NO. 2:19-cv-00532-RSL

STIPULATED MOTION TO EXTEND
EXPERT WITNESS DISCLOSURES
AND DISCOVERY DEADLINES

15 Plaintiff Tressa Grummer and Defendants Washington State Department of Corrections
16 and Robert Carsrud hereby submit this Joint Stipulated Motion to Extend Deadlines for Expert
17 Witness Disclosures and for completing Discovery.

18 On June 7, 2019, this Court entered a Case Scheduling Order in this case. Under the
19 Order, the Court set the deadline for a motion for expert witness disclosures as March 18, 2020,
20 and the discovery cutoff for May 17, 2020. ECF No. 10 at 1.

21 For disclosure of experts and service of written reports, the parties stipulate that there is

STIPULATED MOTION TO EXTEND EXPERT
DISCLOSURE AND DISCOVERY DEADLINES - 1
Case No. 2:19-cv-00532-RSL

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1 good cause for the Court to extend the deadline for expert witness disclosure from the current
2 date of March 18, 2020 to April 17, 2020, or 145 days before the date set for trial. Plaintiff's
3 counsel, Sean M. Phelan, is an attorney of record in *Brzycki v. Harborview Medical Center and*
4 *University of WA*, 2:18-cv-01582-MJP. This case is set for trial on April 6, 2020, necessitating
attention to trial preparation by Ms. Phelan that would otherwise be directed to this case.
5 Similarly, Defendant's counsel, Scott A. Marlow, is an attorney of record in *Rispoli v.*
6 *Department of Children Youth and Family*, 19-2-09467-2 SEA. This case is also set for trial on
7 April 6, 2020, necessitating attention to trial preparation by Mr. Marlow.

8 Due to the above and due to the impact those extensions might have on on-going
discovery, good cause also exists for the extension of the discovery deadline in this case.
9 According to the case schedule, Dkt 10 at 1, the current deadline for completion of discovery is
10 May 17, 2020. The parties propose that this deadline be extended 30 days to June 15, 2020.

11 The parties stipulate to a rebuttal expert deadline of 30 days after the other party's
12 disclosure. *See Fed. R. Civ. P. 26(a)(2)(D)(ii)*. Thus, the proposed stipulated deadlines are as
13 follows:

- 14 • Deadline for reports from expert witnesses under FRCP 26(a)(2) due: April 17, 2020
- 15 • Deadline for reports from rebuttal experts under FRCP 26(a)(2) due: May 18, 2020
- 16 • Deadline for discovery cutoff: June 15, 2020

17 The parties do not anticipate nor intend for these extensions to affect the remaining dates
set forth in the Court's case schedule.

18 For the foregoing reasons, the Court should grant the parties' Stipulated Motion and
19 extend the deadlines as outlined above.

1 RESPECTFULLY SUBMITTED this 6th day of March, 2020.

2 FRANK FREED SIBUT & THOMAS LLP STATE OF WASHINGTON

3 By: /s/ Sean M. Phelan

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5 Attorneys for Plaintiff

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7 Attorneys for Defendants

8 IT IS SO ORDERED:

9 DATED: March 9, 2020.

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12 HONORABLE ROBERT S. LASNIK
United States District Court Judge

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21 STIPULATED MOTION TO EXTEND EXPERT
DISCLOSURE AND DISCOVERY DEADLINES - 3
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